

[Counsel listed on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ENERTRODE, INC.

Plaintiff,

v.

GENERAL CAPACITOR CO. LIMITED.,  
JIANPING ZHENG aka JIM ZHENG, GENERAL  
CAPACITOR INTERNATIONAL, INC.,  
GENERAL CAPACITOR, LLC, AND DOES 1-100.

Defendants.

CASE NO. 3:16-cv-02458-HSG

**APPLICATION TO APPEAR AT  
CASE MANAGEMENT  
CONFERENCE BY TELEPHONE BY  
COUNSEL FOR DEFENDANTS  
GENERAL CAPACITOR CO.  
LIMITED., JIANPING ZHENG aka  
JIM ZHENG; GENERAL  
CAPACITOR INTERNATIONAL,  
INC., GENERAL CAPACITOR, LLC.**

Case Management Conference:

Date: February 28, 2017  
Time: 2:00 p.m.  
Courtroom: 10 (Hon. Haywood Gilliam)

G. Donovan Conwell, Jr., lead counsel for Defendants General Capacitor Co. Limited, Jianping Zheng aka Jim Zheng; General Capacitor International, Inc.; and General Capacitor, LLC (collectively "Defendants") hereby applies to this Court for permission to appear telephonically at the Case Management Conference set for February 28, 2017 at 2:00 pm.

## I. DISCUSSION

### A. **THE COURT CAN ALLOW ATTENDANCE AT THE CASE MANAGEMENT CONFERENCE BY TELEPHONE**

The Court can permit a party to attend a case management conference by telephone. Adv. Comm. Note to 2015 Amendment to Fed. R. Civ. P. 16(b)(1)(B) ("The conference may be held in person, by telephone, or by more sophisticated electronic means."). See also Civil L.R. 16-10(a) in connection with initial case management conferences. ("Requests to participate in the conference by telephone must be filed and served at least 7 days before the conference...").

### B. **THERE IS GOOD CAUSE TO ALLOW COUNSEL TO APPEAR TELEPHONICALLY**

There is good cause to allow Defendants' lead counsel to appear telephonically. Defendants' lead counsel's office (and residence) is in Tampa, Florida. Declaration of George Donovan Conwell, Jr., ¶ 2, filed concurrently herewith. While Defendants' lead counsel appeared in person for the recent Case Management Conference and Mediation Hearing, Defendants' lead counsel can effectively attend and meaningfully participate in the Case Management Conference, via telephone. Id. Defendants' lead counsel will have full authority to make decisions about any issue that may come up during the conference. Id. Additionally, co-counsel Perry J. Narancic, will appear in person at the Case Management Conference. Therefore, there will be no impact on the efficacy of the Conference and there is good cause to allow Defendants' lead counsel to appear telephonically.

## II. CONCLUSION

For the foregoing reason, Defendants, respectfully requests that this Court grant the instant application.

1 Dated: February 17, 2017

2  
3 By: /s/ Perry J. Narancic

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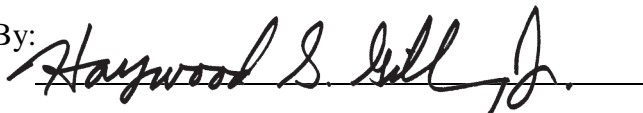
~~PROPOSED~~ ORDER

GOOD CAUSE appearing therefore, Defendants' counsel G. Donovan Conwell, Jr., lead counsel for Defendants General Capacitor Co. Limited, Jianping Zheng aka Jim Zheng; General Capacitor International, Inc.; and General Capacitor, LLC, may appear telephonically at the Case Management Conference set for February 28, 2017 at 2:00 pm. Counsel shall contact CourtCall at (866) 582-6878 to make arrangements for the telephonic appearance.

IT IS SO ORDERED.

DATE: 2/21/2017

By:



Hon. Haywood S. Gilliam, Jr.  
United States District Judge